

ENDNOTES

¹*Kansas/Oklahoma Order*, ¶ 8.

²*Initial 271 Order*.

³Access Integrated Networks, Inc., Birch Telecom of the South, Inc., Covad Communications Company, Mpower Communications, Inc., WorldCom, Inc., MCImetro Access Communications Services, LLC and AT&T Communications of the Southern States, Inc.

⁴*Texas Order*, ¶ 61 (*citing* 47 U.S.C. § 271(c)(2)(B)(i)).

⁵*Id.* (*citing* 47 U.S.C. 251(c)(2)(A)).

⁶*Id.*

⁷*Second Louisiana Order* ¶ 61.

⁸*Texas Order*, ¶ 62.

⁹*Id.*

¹⁰*Id.* at ¶ 63

¹¹*Id.* (*citing* 47 C.F.R. 51.305(a)(5)).

¹²*Pennsylvania Order*, Appendix C, ¶ 8.

¹³*Massachusetts Order*, ¶ 184.

¹⁴*Pennsylvania Order*, Appendix C, ¶ 8.

¹⁵*Id.*

¹⁶See e.g., *Texas Order*, ¶ 67 ("In prior section 271 applications, we relied on trunk blockage data to evaluate a BOC's interconnection quality.").

¹⁷See *Second Louisiana Order*, ¶ 77, n. 218.

¹⁸*Second Louisiana Order*. ¶ 77, n. 217- n. 218.

¹⁹*Id.*

²⁰*Massachusetts Order*, ¶ 185 (stating that absence of complaints by competitors regarding trunk blockage is an indicator that disparities are not competitively significant).

²¹See *Texas Order*, ¶ 63, n. 122 ("Our rules require an incumbent LEC to provide two-way trunking upon request, wherever two-way trunking is technically feasible.").

²²*First Local Competition Order*, ¶ 219.

²³*MCI Arbitration Order*, p. 43.

²⁴*MCI Arbitration Order*, Pgs. 62-63.

²⁵*Texas Order*, ¶ 64.

²⁶*Id.*, at ¶ 64.

²⁷*Second Louisiana Order*, ¶¶ 66, 68.

²⁸*Second Louisiana Order*, ¶¶ 70-71.

²⁹*Second Louisiana Order*, ¶ 71.

³⁰*Id.*

³¹See *Texas Order*, ¶ 64.

³²See *Collocation Reconsideration Order*, ¶ 21 (explaining that national application and processing interval standards for physical collocation will apply in the absence of state standards).

³³See *Kansas-Oklahoma Order*, ¶ 232; *Texas Order*, ¶ 78; *Massachusetts Order*, ¶ 197.

³⁴*AT&T Order on Reconsideration*, Docket No. P-140, Sub 73, p. 13 (August 2, 2001).

³⁵*AT&T Arbitration Order*, p. 15.

³⁶*MCI Arbitration Order*, p. 13.

³⁷*AT&T Arbitration Order*, p. 15.

³⁸*Pennsylvania Order*, ¶ 100 (emphasis added).

³⁹*Id.* at 104.

⁴⁰47 U.S.C. Sec. 251(c)(2).

⁴¹47 U.S.C. Sec. 252(d)(1).

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attention to these issues as long as I remain a member of the Commission.

There has been a significant tendency in recent years to deride the regulatory process as an old and outmoded relic of an obsolete governmental past. Those who adhere to this theory need to be reminded about the fate of those who fail to heed the lessons of history. The regulatory process was created to prevent harm to the public. Although regulation is a less than perfect instrument for the achievement of societal goals and although unnecessary regulation can be just as harmful as or even more harmful than insufficient regulation, recent events have demonstrated the potential harms that may result from inadequately restrained corporate conduct. The restrictions that were imposed on incumbent local exchange companies like BellSouth in the Telecommunications Act of 1996 were developed in an attempt to deal with genuine economic problems in a realistic manner; they were not created merely for the sake of unfairly hamstringing an outstanding corporate citizen such as BellSouth in its efforts to compete in the marketplace. As long as the conditions which justify the imposition of some degree of regulatory control over incumbent local exchange companies remain in existence, this Commission will attempt to vigilantly carry out the duties that have been assigned to it under state and federal law. A major component of that obligation will be to continue to supervise the activities of BellSouth following its entry into the in-region interLATA long distance market until such time as effective competition exists in all segments of the telecommunications market in North Carolina.

A handwritten signature in dark ink, appearing to read "Sam J. Ervin, IV", is written over a horizontal line.

Commissioner Sam J. Ervin, IV

⁶¹*Verizon v. FCC*, Nos. 00-511, 00-555, 00-587, 00-590, and 00-602, 2002 WL 970643 at 22 (Sup. Ct. May 13, 2002).

⁶²*New York Order*, ¶137.

⁶³*Texas Order*, fn. 413.

⁶⁴FCC Rule 51.319(g).

⁶⁵*Recommended Order Concerning All Phase I and Phase II Issues Excluding Geographic Deaveraging*, Docket No. P-100, Sub 133d (June 7, 2001).

⁶⁶*First Local Competition Order*, Appendix B, § 51.5

⁶⁷*Second Louisiana Order*, ¶ 144.

⁶⁸*Second Louisiana Order*, ¶ 107.

⁶⁹*See New York Order*, fn. 488; *Texas Order*, ¶180; and *Massachusetts Order*, ¶ 79.

⁷⁰*First Local Competition Order*, Appendix B, § 51.5.

⁷¹*First Local Competition Order*, Appendix B, § 51.5

⁷²*New York Order*, ¶215.

⁷³*Texas Order*, fn. 565.

⁷⁴*First Local Competition Order*, Appendix B, § 51.5.

⁷⁵*Kansas/Oklahoma Order*, ¶ 2.

⁷⁶*Texas Order*, ¶103.

⁷⁷*See Kansas/Oklahoma Order*, ¶113.

⁷⁸*See Kansas/Oklahoma Order*, ¶111.

⁷⁹*Texas Order*, ¶108.

⁸⁰*See Second Louisiana Order*, ¶364; *New York Order*, ¶433 n. 1326.

⁸¹*See New York Order*, ¶ 231; *see also Texas Order*, ¶ 216; *see also Kansas/Oklahoma Order*, ¶

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activity. At this point, local telecommunications markets in BellSouth's North Carolina territory do not appear to be effectively competitive, particularly for residential customers throughout BellSouth's territory and subscribers of all types located in less urban areas.³ BellSouth's expert, Dr. Taylor, conceded as much when he acknowledged that BellSouth retained market power in North Carolina local telecommunications markets. Until such time as effective competition exists throughout BellSouth's traditional franchised service territory, this Commission will continue to play an important role in regulating BellSouth's local operations in at least two different ways.

First, this Commission still has a vital role to play in protecting the interests of the consumers of telecommunications services located in BellSouth's traditional service territory. Despite the fact that local telecommunications competition has been legal in North Carolina since the enactment of House Bill 161 in 1995, I doubt that anyone would seriously contend that all North Carolina citizens in BellSouth's historic franchised service territory have access to meaningful competitive alternatives. The level of competitive penetration into the residential market remains relatively low, particularly in the less urban parts of the State. Although the level of competition in business markets appears to be more extensive, it is not clear that meaningful competitive options are available to all business customers throughout BellSouth's historic service territory at this time. As a result, except for those who have elected to rely exclusively on wireless service, it is not yet clear that local telecommunications customers throughout BellSouth's service territory have meaningful competitive options in the event that they become dissatisfied with BellSouth's service. So long as that set of circumstances persists, this Commission must fill its traditional role of ensuring that all of BellSouth's customers, particularly residential customers located in more rural areas, receive adequate, reasonably priced telephone service. As a result, the Commission must continue to focus on traditional regulatory issues such as (1) ensuring adequate service quality by monitoring BellSouth's performance and compelling the provision of adequate service if BellSouth fails to meet

³The Commission is scheduled to review the operation of BellSouth's price regulation plan later this year. At that time, the Commission will have an opportunity to receive updated information concerning the state of competition in BellSouth's territory as part of the process of determining the categories in which the various services provided by BellSouth should be placed and the pricing rules which should be applicable to each of those categories. The information received in that proceeding concerning competitive conditions in North Carolina will undoubtedly assist the Commission in making the difficult determination of exactly how much traditional regulatory intervention is still needed in BellSouth's historic service territory.

¹⁰⁵*New York Order*, ¶ 100; *Massachusetts Order*, ¶ 46.

¹⁰⁶*New York Order*, ¶ 100.

¹⁰⁷*Massachusetts Order*, ¶ 13.

¹⁰⁸*Kansas/Oklahoma Order*, ¶ 2.

¹⁰⁹*Second Louisiana Order*, ¶ 86.

¹¹⁰*Id.*

¹¹¹*Kansas/Oklahoma Order*, ¶ 110- 116.

¹¹²*Id.*

¹¹³*Kansas/Oklahoma Order*, ¶ 109.

¹¹⁴*Kansas/Oklahoma Order*, ¶ 115.

¹¹⁵Docket Nos. P-140, Sub 73 and P-646, Sub 7.

¹¹⁶*New York Order*, ¶ 102; *Texas Order*, ¶¶ 110-118.

¹¹⁷Docket Nos. P-140, Sub 73, and P-646, Sub 7.

¹¹⁸Evaluation of the United States Department of Justice, CC Docket No. 01-277, November 6, 2001, Section III.D.1.

¹¹⁹*New York Order*, ¶ 442.

¹²⁰*Id.*

¹²¹See *Kansas/Oklahoma Order*, ¶ 238.

¹²²*Massachusetts Order*, ¶ 41.

¹²³*AT&T Corp. v. FCC*, 20 F.3d at 617-18.

¹²⁴*Second Louisiana Order*, ¶¶ 171-183.

¹²⁵*Kansas/Oklahoma Order* ¶ 177 (citing 47 U.S.C. § 271(c)(2)(B)(iv)).

¹²⁶*Massachusetts Order*, ¶ 121.

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and establishing compliance with the "competitive checklist" as delineated in 47 U.S.C. § 271(c)(2)(B) in the manner permitted by both 47 U.S.C. § 271(c)(2)(A)(i)(I) and 47 U.S.C. 271(c)(2)(A)(i)(II). As a result of the fact that the FCC has generally described the manner in which applicants seeking authorization to provide in-region interLATA service must make the showing required by 47 U.S.C. § 271(c)(1)(A) and establish compliance with the "competitive checklist" set out in 47 U.S.C. § 271(c)(2)(B), the Commission's essential function in this proceeding is to advise the FCC about the extent to which BellSouth has met the requirements of the relevant federal statutory provisions as interpreted by the FCC.

As is reflected in the Commission's order, the FCC has already granted BellSouth the authority to provide in-region interLATA service originating in Georgia and Louisiana. In reaching that decision, the FCC concluded that BellSouth met the requirements of 47 U.S.C. § 271(c)(1)(A) given the existence of adequate facilities-based competitive alternatives for residential and business customers in both states and that BellSouth had demonstrated adequate compliance with the market-opening requirements of the "competitive checklist." In the Matter of Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 02-35, Memorandum Opinion and Order (Released May 15, 2002) (BellSouth Georgia-Louisiana 271 Order). During the process of deciding the Georgia-Louisiana proceeding, the FCC addressed and rejected numerous objections to BellSouth's request by analyzing a record that appears virtually indistinguishable from the record that has been developed in this proceeding. As a result of the fact that the BellSouth Georgia-Louisiana 271 Order decides almost all of the issues which we must address in this proceeding in BellSouth's favor and the fact that BellSouth has convincingly demonstrated that its operational support systems and competitive policies are provided or applied in a virtually-identical fashion throughout its nine-state region, I believe that the Commission has acted appropriately in recommending that the FCC approve BellSouth's application.² This decision does not, however, mean

²As our records reflect, I dissented from the Commission's decisions in a number of relatively recent interconnection arbitration proceedings to allow BellSouth to require competitors to bear the cost of delivering traffic from the borders of its existing calling areas to the competitor-selected single point of physical interconnection authorized by the FCC's rules. In re Arbitration of Interconnection Agreement Between AT&T Communications of the Southern States, Inc., and TCG of the Carolinas, Inc., and BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996, Docket Nos. P-140, Sub 73, and P-646, Sub 7, Recommended Arbitration Order (Issued March 9, 2001); In re Petition of MCImetro Access Transmission Services, L.L.C., for

¹⁴⁴*Id.* (citing *Texas Order*, ¶ 299).

¹⁴⁵See *Massachusetts Order*, ¶ 146 (finding that adjusted data coupled with a trend toward improvement is sufficient to conclude Verizon is installing loops in a nondiscriminatory manner).

¹⁴⁶*Massachusetts Order*, ¶ 149; See also *Georgia Recommendations and Mississippi Order*.

¹⁴⁷See *Massachusetts Order*, ¶ 150 (finding that, for mean time to repair, Verizon was in near facial parity when it repaired its retail lines less than two hours less than it repaired the CLPs' lines).

¹⁴⁸See *Kansas/Oklahoma Order*, ¶ 200.

¹⁴⁹Cf. *Massachusetts Order*, ¶ 158 ("Verizon's hot cut process includes a number of steps that Verizon and competitors must take during the days preceding the hot cut. These steps include pre-wiring a cross-connection from the competitor's collocation arrangement to Verizon's main distribution frame prior to the committed date and time of the hot cut, setting the appropriate Local Number Portability triggers and confirming with the competitor that the loop is to be cut over to a competitor's switch.").

¹⁵⁰*Texas Order*, ¶ 256.

¹⁵¹*Massachusetts Order*, ¶ 159.

¹⁵²*UNE Remand Order*, ¶ 207.

¹⁵³*Id.* ¶ 206.

¹⁵⁴*Massachusetts Order*, ¶ 155.

¹⁵⁵*Kansas/Oklahoma Order*, ¶ 215.

¹⁵⁶47 CFR 51.319(c) (. . . "An incumbent LEC shall be required to provide nondiscriminatory access in accordance with § 51.311 and section 251(c)(3) of the Act to packet switching capability on an unbundled basis to any requesting telecommunications carrier for the provision of a telecommunications service only in the limited circumstance described in § 51.319(c)(4)").

¹⁵⁷*Texas Order*, ¶¶ 323-329.

¹⁵⁸*Texas Order*, ¶ 330 (emphasis added).

¹⁵⁹*Texas Order*, ¶ 325 (emphasis added).

¹⁶⁰*Massachusetts Order*, ¶ 180.

DOCKET NO. P-55, SUB 1022

COMMISSIONER SAM J. ERVIN, IV, CONCURRING

Although I fully concur in the Commission's decision to recommend that the Federal Communications Commission approve an application by BellSouth Telecommunications, Inc., to provide in-region interLATA service in North Carolina and in virtually all of the logic upon which the Commission has relied to support this determination,¹ I write separately to emphasize my belief that approval of BellSouth's application is only a stage in the process of facilitating the development of the competitive telecommunications market contemplated by the Telecommunications Act of 1996 and House Bill 161 and that the Commission's work in the area of telecommunications regulation is far from complete. On the contrary, I strongly believe that the Commission will be intimately involved in regulating the telecommunications market in North Carolina for the foreseeable future.

¹The Commission concludes that approval of BellSouth's application to provide in-region interLATA service in North Carolina will stimulate significant additional competition in North Carolina local exchange markets as part of its public interest analysis. Although I recognize that allowing BellSouth to provide interLATA service could conceivably be a factor in stimulating additional competition in North Carolina local markets, I do not believe that such a decision, standing alone, will have much effect on the extent to which North Carolina local markets become more competitive. On the contrary, the extent to which a particular market participant elects to enter a specific market is undoubtedly affected by a wide range of factors. A decision to allow an incumbent Bell operating company to provide long distance service is only one of numerous relevant considerations which a new entrant must examine. As a result, although I believe that the record establishes that BellSouth faces actual facilities-based competition as contemplated by 47 U.S.C. § 271(c)(1)(A); that BellSouth has adequately complied with the market-opening provisions of the "competitive checklist" as set out in 47 U.S.C. § 271(c)(2)(B); that the Commission has adopted adequate anti-backsliding measures to strongly encourage continued BellSouth compliance with the market-opening measures required by federal law; that allowing BellSouth to provide in-region interLATA service will benefit consumers of long-distance services; that any "price squeeze" argument advanced in opposition to BellSouth's proposal does not justify rejection of the present application; and that approval of BellSouth's application would be in the public interest, I am not convinced that approval of BellSouth's application, in and of itself, will stimulate significant additional competition in North Carolina local markets and do not support the majority's reliance upon this conclusion as part of its public interest analysis.

¹⁸⁴*Texas Order*, ¶ ¶ 352-354.

¹⁸⁵*Second Louisiana Order*, ¶ 253.

¹⁸⁶*Id.*, ¶ 254.

¹⁸⁷*Id.*, ¶ 257.

¹⁸⁸*Second Louisiana Order*, ¶ 252.

¹⁸⁹*See* 47 C.F.R. 51.319.

¹⁹⁰*Texas Order*, ¶ 362.

¹⁹¹*Id.*

¹⁹²Section 251(e)(2).

¹⁹³Section 153(30) of TA96.

¹⁹⁴*Third Number Portability Order*, ¶ 3, fn. 4.

¹⁹⁵*Second Louisiana Order*, ¶ 276.

¹⁹⁶Section 251(b)(2).

¹⁹⁷47 CFR 51.205.

¹⁹⁸Section 153(15).

¹⁹⁹47 CFR 51.207.

²⁰⁰*Association of Communications Enterprises v. Federal Communications Commission and United States of America* (Case No. 00-1144, decided June 26, 2001).

²⁰¹*New York Order*, ¶ 393.

²⁰²*Second Louisiana Order*, ¶ 319.

²⁰³*Second Louisiana Order*, ¶¶ 46-48.

²⁰⁴*Michigan Order*, ¶¶ 386, 387.

APPENDIX B
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Massachusetts Order - Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) and Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 01-9, Memorandum Opinion and Order (Released April 16, 2001)

ISP Traffic Remand Order - Implementation of the Local Competition Provisions in the Telecommunications Act of 1996: Intercarrier Compensation for ISP-Bound Traffic, CC Docket Nos. 96-98, 99-68, Order on Remand and Report and Order (Released April 27, 2001)

Collocation Remand Order - In the Matter of Implementation of Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147, Fourth Report and Order, (Released August 8, 2001)

Connecticut Order - Application of Verizon New York Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization to Provide In-Region, InterLATA Services in Connecticut, CC Docket No. 01-100, Memorandum Opinion and Order (Released July 20, 2001)

Pennsylvania Order - Application of Verizon Pennsylvania Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for Authorization To Provide In-Region, InterLATA Services in Pennsylvania, CC Docket No. 01-138, Memorandum Opinion and Order (Released September 19, 2001)

Mississippi 271 Order - Consideration of the Provision of In-Region InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to Section 271 of TA 96, Docket No. 97-AD-321, Final Order (Released October 4, 2001)

Georgia Consultative Report - Joint Application by BellSouth Telecommunications, Inc., et al., for Authorization to Provide In-Region, InterLATA Service in the States of Georgia and Louisiana Pursuant to Section 271 of the Telecommunications Act, CC Docket No. 01-277 (Released October 22, 2001)

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ACNI	Average Completion Notice Interval
ADSL	Asymmetrical Digital Subscriber Loop
ADUF	Access Daily Usage File
AIN	Advanced Intelligence Network
ALI/DMS	Automatic Location Identification/Data Management System
BFR	Bona Fide Request
BOC	Bell Operating Company
CABS	Carrier Access Billing System
CAVE	CLP Application Verification Environment
CCP	Change Control Process
CFA	Connecting Facility Assignment
CFD	Corporate Facilities Database
CLEC	Competing Local Exchange Carrier
CLP	Competing Local Provider
CN	Completion Notice
CNAM	Calling Name Delivery
CO	Central Office
COG	Corporate Gateway
COSMOS	Computer System Mainframe Operations
CRIS	Customer Record Inquiry System
CRSG	Complex Resale Support Group
CSOTS	CLP Service Order Tracking System
CSR	Customer Service Record
CWINS	Customer Wholesale Interconnection Network Service Center
DA	Directory Assistance
DAAS	Directory Assistance Access Service
DACC	Directory Assistance Call Completion
DADAS	Direct Access Directory Assistance Service
DADS	Directory Assistance Database Service
DCSC	Data Customer Support Center
DID	Direct Inward Dialing
DLC	Digital Loop Carrier
DOE	Direct Order Entry
DOJ	Department of Justice

APPENDIX B
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FCC ORDER REFERENCES

First Local Competition Order - Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order (Released August 8, 1996)

Number Portability Opinion and Order - Telephone Number Portability, CC Docket No. 95-116, First Memorandum Opinion and Order on Reconsideration (Released March 11, 1997)

South Carolina Order- Application of BellSouth Corporation, et al., Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, Inter-LATA Services in South Carolina, CC Docket No. 97-208 Memorandum Opinion and Order (Released December 24, 1997)

Third Number Portability Order - Telephone Number Portability, CC Docket No. 95-116, Third Report and Order (Released May 12, 1998)

Second Louisiana Order - Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance Inc., for Provision of In-Region, Inter-LATA Services in Louisiana, CC Docket No. 98-121 Memorandum Opinion and Order (Released October 13, 1998)

Michigan Order - Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137, Memorandum Opinion and Order (Released August 19, 1991)

Line Sharing Order - Deployment of Wireline Services Offering Advanced Telecommunications Capabilities and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Third Report and Order, CC Docket 98-147, Fourth Report and Order, CC Docket No. 96-98 (1999)

UNE Remand Order - Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, Third Report and Order and Fourth Further Notice of Proposed Rulemaking (Released November 5, 1999)

APPENDIX A
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LISC	Local Interconnection Service Center
LMU	Loop Make-up Information
LNP	Local Number Portability
LQS	Loop Qualification System
LSR	Local Service Request
MOU	Memorandum of Understanding
MSA	Metropolitan Statistical Area
NGDLC	Next Generation Digital Loop Carrier
NID	Network Interface Device
NPA	Numbering Plan Area
NXX	Central Office Codes
OBF	Ordering and Billing Forum
OCI	Order Completion Interval
OCn	Optical Carrier
OCN	Operating Company Number
ODUF	Optional Daily Usage File
OLNS	Operator Line Number Screening
OS/DA	Operator Services/Directory Assistance
OSS	Operations Support Systems
PMAP	Performance Measure and Analysis Platform
POI	Point of Interconnection
PON	Purchase Order Number
POTS	Plain Old Telephone Service
PSAP	Public Safety Access Point
PSC	Public Service Commission
PWC	PriceWaterhouseCoopers
RNS	Regional Negotiation System
ROS	Regional Order System
RSAG	Regional Street Address Guide
RSIMMS	Volume Testing Environment
SAC	Service Advocacy Center
SBC	Southwestern Bell Telephone Company
SCP	Service Control Points
SEEM	Self-Effectuating Enforcement Mechanism
SGAT	Statement of Generally Accepted Terms and Conditions

adopted and currently is reviewing standards, measurements, and penalties to ensure that quality service is provided to both retail and wholesale customers. We must enforce these standards aggressively on behalf of the intended beneficiaries as well as review and reform them as experience informs our prior determinations as to what is appropriate and necessary. It is my hope that BellSouth will embrace these standards and strive to comply with them, not because they represent what is minimally acceptable, but because they are an articulation of what its customers, both wholesale and retail, have a right to expect. The standards we have set can be met and exceeded, and doing so would be good for both BellSouth and its customers.

Another issue over which we must be vigilant is pricing. While the benefits of competition have, and will continue, to be available to certain segments of the market, we must work to ensure that these benefits are spread more broadly so that the vision of fast, dependable, and affordable service becomes a reality according to 21st century standards. In this regard, I would note that we are reviewing the Price Plans of our three largest incumbent local exchange companies – BellSouth, Verizon, and Carolina Telephone – in October and are reviewing BellSouth's UNE prices under the new BSTLM Model in November. This will enable this Commission to address emerging issues promptly.

Finally, as we move further down the path toward deregulation, the regulatory paradigm should be considered. Both the nature and timing of the issues brought before this Commission for resolution are changing. The parties and this Commission must recognize that more and more we will be asked to resolve what are essentially business disputes between competitors that impact upon their customers. In this context, the interested parties and this Commission should consider appropriate changes to our rules and procedures which can enable us to be more responsive and effective in our changing role. For example, alternative dispute resolution methods might be developed which could provide more efficient, responsive and cost-effective resolutions than the more traditional adversarial process. I encourage the Commission, the Public Staff, and interested parties to think creatively about the manner in which our role might evolve as this important industry continues to do so.



Commissioner James Y. Kerr, II

⁴²The FCC has defined OSS as the various systems, databases, and personnel used by incumbent LECs to provide service to their customers. *New York Order*, ¶ 83; *South Carolina Order*, ¶ 82; and *Texas Order*, ¶ 92.

⁴³*New York Order*, ¶ 82 and *Texas Order*, ¶ 92.

⁴⁴See *New York Order*, ¶ 102 and n.277 (citations omitted).

⁴⁵*Texas Order*, ¶ 92.

⁴⁶*New York Order*, ¶¶ 81-85 and fn. 202.

⁴⁷*Texas Order*, ¶ 94; *New York Order*, ¶ 85.

⁴⁸*Texas Order*, ¶ 95; *New York Order*, ¶ 86.

⁴⁹*Second Louisiana Order*, ¶¶ 85-87, *Texas Order*, ¶ 95.

⁵⁰*Second Louisiana Order*, ¶ 85; *New York Order*, ¶ 87.

⁵¹*Texas Order*, ¶ 97.

⁵²*Id.*

⁵³*Second Louisiana Order*, ¶ 86 and ¶ 92 ("The most critical aspect of evaluating a BOC's OSS is the actual performance results of commercial usage"); see also *Texas Order*, ¶ 98.

⁵⁴*Second Louisiana Order*, ¶ 86.

⁵⁵47 U.S.C. Sec. 252(d)(1).

⁵⁶See *First Local Competition Order*, ¶¶ 672-678; 47 C.F.R. §§ 51.501 *et seq.*; see *Line Sharing Order*, ¶¶ 133-159 (concluding that states should set the prices for line sharing as a new network element in the same manner as the states set prices for other UNEs).

⁵⁷See *Iowa Utils. Bd. v. FCC*, 109 F.3d 418 (8th Cir. 1996), 120 F.3d 753, 800, 804-06 (8th Cir. 1997), *aff'd in part, rev'd in part sub nom. AT&T Corp. v. Iowa Utils. Bd.*, 525 U.S. 366 (1999).

⁵⁸*AT&T Corp. v. Iowa Utils. Bd.*, 525 U.S. at 397.

⁵⁹*Iowa Utils. Bd. v. FCC*, 219 F.3d 744 (8th Cir. 2000), *cert. granted sub nom. Verizon Communications, Inc. v. FCC*, 121 S. Ct. 877 (2001).

⁶⁰*Iowa Utils. Bd. v. FCC*, No. 96-3321 *et al.* (8th Cir., September 25, 2000).

DOCKET NO. P-55, SUB 1022

COMMISSIONER JAMES Y. KERR, II, CONCURRING: I join in the majority opinion but write separately in order to emphasize my broader concerns about the work that we have in front of us now that we have reached this determination that BellSouth is compliant with the TA96, Section 271 checklist and should be permitted to enter the interstate, interLATA long distance market.

Initially, it should be made clear that our review of the matter at hand has resulted in a unanimous decision that the requirements of TA96 have been met. This decision is the culmination of much hard work by many parties, including this Commission, the Public Staff, BellSouth, and the intervenors in this docket. I am pleased with the manner in which the relevant issues have been joined, discovered and tried in this forum. In particular, I commend the participants in our most recent hearings not only for the manner in which they conducted themselves, but also the skill with which they have advocated their positions on the issues. These are complex and difficult decisions for us to make, and the process was served well by both our staff and those who advocated their positions before us.

In this regard, I want to make clear that, in finding that BellSouth is Section 271 compliant, we are holding only that BellSouth has met the requirements established by Congress. BellSouth has worked hard to meet them and has done so. This does not mean that the market for local telecommunication services in North Carolina is "perfectly competitive". Instead, all interested parties must recognize and accept that this chapter in the de-regulation of the industry will soon be behind us, and we move into an even more challenging chapter in this process. With today's decision, we put behind us the question of "if" BellSouth has complied with Section 271, and move on to the more difficult question of "how" fully competitive markets should operate. With all markets open to all potential competitors, we need to remind ourselves that competition is not an end unto itself, but rather a means to an end. The ultimate goal, which Congress has judged should be achieved through competition, is simple – fair prices for quality, reliable, and innovative telecommunications service. Today's decision represents nothing more than a single step toward this ultimate destination. Now is not the time for interested parties, whether they be ILECs, CLECs, IXC's, or regulators, to abandon the journey. While there are many relevant issues over which this Commission lacks either influence or jurisdiction, (such as business decisions, capital markets, matters of federal jurisdiction, etc.), we must remain actively engaged in many other important issues concerning the manner in which fully competitive markets will operate in North Carolina.

The two most important issues we must commit ourselves to deal with on a going-forward basis for the benefit of BellSouth's competitors and its customers are the Performance Measures and Service Quality dockets (Docket Nos. P-100, Sub 99 and Sub 133k). BellSouth must operate its business in a manner which embraces its service quality obligation to both its retail and wholesale customers. This Commission has

⁸² *Kansas/Oklahoma Order* ¶112 with fns.

⁸³ *New York Order*, fn. 390.

⁸⁴ *New York Order*, fn. 392.

⁸⁵ *UNE Remand Order*, ¶ 3

⁸⁶ *Collocation Remand Order*, ¶¶ 80-84.

⁸⁷ See *Texas Order*, ¶¶ 96-98; *New York Order*, ¶¶ 87-89.

⁸⁸ See, e.g., *Kansas/Oklahoma Order*, ¶ 138; *Massachusetts Order*, ¶ 65.

⁸⁹ *Texas Order*, ¶ 98; *New York Order*, ¶ 89.

⁹⁰ See *Texas Order*, ¶ 147; *New York Order*, ¶ 128.

⁹¹ *Texas Order*, ¶ 152.

⁹² *Id.*

⁹³ *Second Louisiana Order*, ¶ 96.

⁹⁴ See *Texas Order*, ¶ 170.

⁹⁵ See *Kansas/Oklahoma Order*, ¶ 138.

⁹⁶ *Texas Order*, ¶ 181.

⁹⁷ *Massachusetts Order*, ¶ 78.

⁹⁸ *Texas Order*, ¶ 180; *New York Order*, fn. 488.

⁹⁹ *Texas Order*, ¶184.

¹⁰⁰ See *Massachusetts Order*, ¶ 90; *Texas Order*, ¶ 194.

¹⁰¹ *Massachusetts Order*, ¶ 96; *Texas Order*, ¶ 209.

¹⁰² *Docket Nos. P-140, Sub 73 and P-646, Sub 7.*

¹⁰³ *New York Order*, ¶215; *Texas Order*, fn. 565.

¹⁰⁴ *New York Order*, ¶ 226; *Texas Order*, ¶ 210.

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the standards set out in the Commission's rules and (2) protecting customers from unjust and unreasonable rates through the adoption of appropriate regulatory schemes of the type authorized by G.S. 62-133.5. Although both House Bill 161 and the Telecommunications Act of 1996 envision a day when traditional regulation of incumbent local exchange companies will be a thing of the past, that day has not arrived.

Secondly, this Commission will continue to be intensively involved in regulating BellSouth's dealings with competitors. Although BellSouth has opened its local markets sufficiently to justify an award of relief pursuant to 47 U.S.C. § 271, there is still work to be done. Commissioner Copps said in his concurring opinion in the BellSouth Georgia-Louisiana 271 proceeding that "BellSouth only minimally passes the statutory checklist" "[i]n a number of areas," "including in particular the operations support systems and the process for updating those systems." Although I would not go as far as to give BellSouth a "minimally passing" grade, I do believe that there are areas of legitimate concern about certain matters debated in this proceeding. As a result, the Commission must be vigilant in continuing to work toward the development of an environment in which BellSouth and those who seek to compete with it have a fair opportunity to prevail in the marketplace on the economic merits of their respective service offerings. Among other things, the Commission must become much more heavily focused upon enforcing the terms and conditions of interconnection agreements between BellSouth and its competitors. Although the enforcement process is necessarily imperfect, it may well be the most important part of our work in attempting to facilitate the development of effective competition in North Carolina local markets in the future. I am particularly concerned that we take appropriate action in the event that the Change Control Process does not provide an adequate mechanism for correcting deficiencies in or working improvements to BellSouth's operations support systems. Similarly, the Commission must continue to ensure that the rates BellSouth charges to competitors for unbundled network elements comply with the TELRIC standard enunciated by the FCC and upheld by the Supreme Court and that competitors are able to collocate their equipment in BellSouth central offices under reasonable rates, terms, and conditions. In addition, we must continue our work in the area of performance measurements and self-effectuating penalties in an effort to ensure that BellSouth faces incentives that are sufficient to ensure that competitors have a fair chance to compete in the North Carolina local marketplace. Finally, the Commission must continue to arbitrate interconnection agreements in a fair and equitable manner, a process that provides us with both the opportunity and the obligation to fairly determine the terms and conditions under which BellSouth interconnects with and provides services to its competitors. As a result, the Commission still has much work to do in effectuating the competitive vision which animated the work of those who drafted House Bill 161 and the Telecommunications Act of 1996, and I am resolved to pay careful

¹²⁷ *Kansas/Oklahoma Order*, ¶ 178.

¹²⁸ *Id.*

¹²⁹ *Id.*

¹³⁰ *Id.* at ¶ 179.

¹³¹ *Massachusetts Order*, ¶¶ 121-122.

¹³² *Id.* at ¶ 122.

¹³³ *Id.*

¹³⁴ *Id.*

¹³⁵ Although not technically correct, Digital Loops are discussed in the Access Voice Grade Loops. KMC's places its position under this sub-heading in its Post-Hearing Matrix. BellSouth's monthly state summaries also discuss digital loop performance measures with voice grade loops. Therefore, KMC's assertions and BellSouth's performance measures and testimony regarding digital loops are discussed in this sub-heading.

¹³⁶ See *Texas Order*, ¶ 248; *Kansas/Oklahoma Order*, ¶ 208 (FCC continues to rely primarily upon missed installation intervals and average installation intervals); see also Georgia Consultative Report, pps. 154-155; *Mississippi Order*, p. 72.

¹³⁷ Cf. *Second Louisiana Order*, ¶¶ 192-199 (finding that BellSouth failed to provide sufficient data to demonstrate compliance with this checklist item).

¹³⁸ See *Pennsylvania Order*, ¶ 83 (discussing that Section 271 application was not proper forum to resolve dispute regarding whether trouble tickets were closed too early).

¹³⁹ *Massachusetts Order* 136.

¹⁴⁰ *Id.*

¹⁴¹ See *Texas Order*, ¶ 249 (The FCC "examine[s] the data for all the various loop performance measurements, as well, as the factors surrounding the development of these performance measurements, in order to evaluation in the aggregate whether SWBT provides local loops in accordance with the requirements of checklist 4").

¹⁴² See *Massachusetts Order*, ¶ 122.

¹⁴³ *Id.* at ¶ 142.

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that the Commission has completed the process of implementing telecommunications competition in North Carolina or that it can fade away into regulatory oblivion so far as BellSouth is concerned. On the contrary, I believe that our work has, in many respects, only just begun.

Throughout much of the last century, the telecommunications industry was deemed to be a natural monopoly appropriately subject to rate base, rate of return regulation. This consensus held until relatively recent times, when it began fading with the advent of successful long distance competition in the 1970s and 1980s. Although current federal and state telecommunications policy places much greater reliance upon the use of market forces to ensure the provision of adequate, reasonably-priced telecommunications services than had been the case in the past and is intended to result in an industry governed primarily by market forces rather than regulatory fiat, the transition from a regulated telecommunications industry to one governed primarily by market forces cannot be accomplished easily or rapidly and necessarily requires a great deal of regulatory

Arbitration of Certain Terms and Conditions of the Proposed Agreement with BellSouth Telecommunications, Inc., Concerning Interconnection and Resale Under the Telecommunications Act of 1996, Docket No. P-474, Sub 10, Recommended Arbitration Order (Issued April 3, 2001). Although I continue to be concerned that the logic inherent in the existing FCC rules and decisions authorizing competitors to select a single point of interconnection in each LATA, In the Matter of Joint Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, CC Docket No. 00-217, Memorandum Opinion and Order, ¶ 23 (Released January 22, 2001), and precluding incumbents from requiring competitors to pay costs associated with the delivery of traffic to the point of interconnection, 47 C.F.R. § 51.703(b), prohibits the result reached by the majority in those proceedings, the FCC has clearly stated that the practice approved in those proceedings does not prevent an award of relief under 47 U.S.C. § 271. BellSouth Georgia-Louisiana 271 Order ¶ 208; In the Matter of Application of Verizon Pennsylvania, Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks, Inc., and Verizon Select Services, Inc., for Authorization to Provide In-Region, InterLATA Services in Pennsylvania, CC Docket No. 01-138, Memorandum Opinion and Order, 16 FCC Red. 17419, ¶ 100 (Released September 19, 2001). As a result, while I continue to have doubts about the appropriateness of the relevant provisions of BellSouth's SGAT and carrier-specific interconnection agreements with respect to this issue, my concerns provide no basis for refusing to support an award of relief under 47 U.S.C. § 271 in this proceeding.

¹⁶¹ *Second Louisiana Order*, ¶ 201.

¹⁶² *Local Competition Order*, ¶ 440.

¹⁶³ *UNE Remand Order*, ¶¶ 323 and 326; *New York Order*, n. 1041.

¹⁶⁴ *Second Louisiana Order*, ¶ 202.

¹⁶⁵ *New York Order*, ¶ 346.

¹⁶⁶ *First Local Competition Order*, ¶ 412.

¹⁶⁷ *Id.* at ¶ 418.

¹⁶⁸ *Id.* at ¶ 426.

¹⁶⁹ *UNE Remand Order*, ¶ 278.

¹⁷⁰ *Id.* at ¶ 304.

¹⁷¹ *Id.* at ¶ 313.

¹⁷² *Second Louisiana Order*, ¶ 210.

¹⁷³ *Second Louisiana Order*, ¶ 224.

¹⁷⁴ *Second Louisiana Order*, ¶¶ 235, 239, and 244.

¹⁷⁵ *New York Order*, ¶ 349; *Texas Order*, ¶ 344.

¹⁷⁶ *Second Louisiana Order*, ¶ 241, *citing* 47 U.S.C. § 51.217(c)(3).

¹⁷⁷ *Id.*

¹⁷⁸ ¶¶ 243 and 248.

¹⁷⁹ ¶ 243.

¹⁸⁰ *Id.*

¹⁸¹ ¶ 245.

¹⁸² ¶ 247.

¹⁸³ *New York Order*, ¶¶ 357-359.

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According to 47 U.S.C. §271(c), a Bell operating company is entitled to obtain FCC authorization to provide in-region interLATA services in the event that it proves the existence of four elements. First, the Bell operating company must have either (1) "entered into one or more binding agreements that have been approved under [47 U.S.C. § 252] specifying the terms and conditions under which the Bell operating company is providing access and interconnection to its network facilities for the network facilities of one or more unaffiliated competing providers of telephone exchange service . . . to residential and business subscribers," with "such telephone exchange service [to be] offered by such competing providers either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities in combination with the resale of the telecommunications services of another carrier," 47 U.S.C. § 271(c)(1)(A), or (2) "after 10 months after February 8, 1996, no such provider has requested the access and interconnection described in [47 U.S.C. § 271(c)(1)(A)] before the date which is 3 months before the date the company makes its application under subsection (d)(1) of this section," "a statement of the terms and conditions that the company generally offers to provide such access and interconnection has been approved or permitted to take effect by the State commission under section 252(f) of this title." 47 U.S.C. § 271(c)(1)(B). Secondly, the Bell operating company must provide "access and interconnection pursuant to one or more agreements described in" 47 U.S.C. § 271(c)(1)(A) or "such company is generally offering access and interconnection pursuant to a statement described in" 47 U.S.C. § 271(c)(1)(B) and "such access and interconnection meets the requirements of" the "competitive checklist" set out in 47 U.S.C. § 271(c)(2). 47 U.S.C. § 271(c)(2)(ii). Thirdly, "the requested authorization [must] be carried out in accordance with the requirements of" 47 U.S.C. § 272. Finally, "the requested authorization [must be] consistent with the public interest, convenience, and necessity." 47 U.S.C. § 271(d)(3)(C).

As part of the process which it must follow in considering an application by a Bell operating company for authorization to provide in-region interLATA service, "the [FCC] shall consult with the State commission of any State that is the subject of the application in order to verify the compliance of the Bell operating company with the requirements of" 47 U.S.C. § 271(c). 47 U.S.C. § 271(d)(2)(B). As a result, 47 U.S.C. § 271(d)(2)(B) requires the FCC to consult with this Commission concerning the extent to which BellSouth meets the requirements of either 47 U.S.C. § 271(c)(1)(A) or 47 U.S.C. § 271(c)(1)(B) and whether any interconnection agreements as described in 47 U.S.C. § 271(c)(2)(A)(i)(I) or any statement of generally available terms and conditions as described in 47 U.S.C. § 271(c)(2)(A)(i)(II) comply with the requirements of the "competitive checklist" set out in 47 U.S.C. § 271(c)(1)(C). In this instance, BellSouth has sought authority to provide in-region interLATA service by attempting to make the showing required by 47 U.S.C. § 271(c)(1)(A)

²⁰⁵*Id.*, ¶ 388.

²⁰⁶*Id.*, ¶ 389.

²⁰⁷*Id.*, ¶ 390. The Department of Justice has expressed the opinion that BOC long distance authority is not consistent with the public interest absent a demonstration that the local market is "irreversibly open to competition." *Id.*, ¶ 382.

²⁰⁸*Michigan Order*, ¶ 55.

²⁰⁹*Michigan Order*, ¶ 391.

²¹⁰*Id.*, ¶ 391.

²¹¹*Id.*, ¶ 392.

²¹²*Id.*, ¶¶ 393-394. See also *Second Louisiana Order*, ¶¶ 361-365.

²¹³See *Michigan Order*, ¶ 402.

²¹⁴*Texas Order*, ¶ 419. See also *New York*, ¶ 427.

²¹⁵*Michigan Order*, ¶ 55.

²¹⁶*Kansas/Oklahoma Order*, ¶ 266.

²¹⁷*Pennsylvania Order*, ¶ 125.

²¹⁸*Second Louisiana Order*, ¶ 363.

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Georgia/Louisiana Order (GALA II Order) - Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc. and BellSouth Long Distance, Inc. for Provision of In-Region, InterLata Services in Georgia and Louisiana, CC Docket No. 02-35, Memorandum Opinion and Order (Released May 15, 2002)

North Carolina Utilities Commission Order References

Initial 271 Order - Application of BellSouth Telecommunications, Inc., to Provide In-Region InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996, Docket No. P-55, Sub 1022, Order Regarding Section 271 Requirements (Issued January 14, 1998)

AT&T Arbitration Order - Arbitration of Interconnection Agreement Between AT&T Communications of the Southern States, Inc., and TCG of the Carolinas, Inc., and BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996, Docket No. P-140, Sub 73, and Docket No. P-646, Sub 7, Recommended Arbitration Order (Issued March 9, 2001)

MCI Arbitration Order - Petition of MCI Metro Access Transmission Services, LLC, for Arbitration of Certain Terms and Conditions of the Proposed Agreement with BellSouth Telecommunications, Inc., Concerning Interconnection and Resale Under the Telecommunications Act of 1996, Docket No. P-474, Sub 10, Recommended Arbitration Order (Issued April 3, 2001)

Collocation Order - Order Addressing Collocation Issues, Docket No. P-100, Sub 133j (Issued December 28, 2001)

New UNE Order - Order Establishing Schedule for New UNE Proceeding, Docket P-100, Sub 133d (Issued April 19, 2002)

Performance Measurements Order - Order Concerning Performance Measurements and Enforcement Mechanisms, Docket No. P-100, Sub 133k (Issued May 22, 2002)

APPENDIX A
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DSL	Digital Subscriber Line
DSLAM	Digital Subscriber Line Access Multiplexer
DUF	Daily Usage Feed/Files
E911	Enhanced 911
ECD	Estimated Completion Date
ECS	Electronic Communications Support
ECTA	Electronic Communications Trouble Administration
EDI	Electronic Data Interchange
EEL	Enhanced Extended Loop
EODUF	Enhanced Optional Daily Usage File
ESD	Estimated Service Date
FCC	Federal Communications Commission
FDI	Feeder Distribution Interface
FID	Field Identifiers
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
GPSC	Georgia Public Service Commission
HDSL	High-Bit-Rate Digital Subscriber Line
IDLC	Integrated Digital Loop Carrier
ISDL	Integrated Digital Subscriber Line
ILEC	Incumbent Local Exchange Company
INSC	Intelligent Network Service Center
ISDN	Integrated Services Digital Network
ISP	Internet Service Provider
IXC	Interexchange Carrier
KCI	KPMG Consulting, Inc.
KPMG	KPMG Consulting, Inc.
LCC	Line Class Code
LCSC	Local Carrier Service Center
LEC	Local Exchange Carrier
LENS	Local Exchange Navigation System
LEO	Local Exchange Ordering
LESOG	Local Exchange Service Order Generation
LFACS	Loop Facility Assignment and Control System
LIDB	Line Information Database

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New York Order - Application of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region InterLATA Service in the State of New York, CC Docket No. 99-925, Memorandum Opinion and Order (Released December 22, 1999)

Advanced Services Remand Order - Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket Nos. 98-147, 98-126, 98-78, 98-91, Order on Remand (Released December 23, 1999)

Supplemental Clarification - Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Supplemental Order Clarification (Released June 2, 2000)

Texas Order - Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas, CC Docket No. 00-65, Memorandum Opinion and Order (Released June 30, 2000)

Collocation Reconsideration Order - In the Matter of Implementation of Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147, Fourth Report and Order (Released August 10, 2000)

Line Sharing Reconsideration Order - Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 98-147, Third Report and Order on Reconsideration and Third Further Notice of Proposed Rulemaking, CC Docket No. 96-98, Fourth Report and Order on Reconsideration and Sixth Further Notice of Proposed Rulemaking (Released January 19, 2001)

Kansas/Oklahoma Order - Joint Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, CC Docket No. 00-217, Memorandum Report and Order (Released January 22, 2001)

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SMS	Service Management Systems
SOCS	Service Order Communication System
SONGS	Service Order Negotiation System
SQM	Service Quality Measures
STP	Supplemental Test Plan
TAFI	Trouble Analysis Facilitation Interface
TAG	Telecommunications Access Gateway
TELRIC	Total Element Long-Run Incremental Cost
UCL	Unbundled Copper Loop
UCL-ND	Non-Designed Unbundled Copper Loop
UDC	Unbundled Digital Channel
ULM	Unbundled Loop Modification
UNE	Unbundled Network Element
UNE-P	UNE Platform
USOCs	Universal Service Ordering Codes